

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

SIMRET SEMERE TEKLE)

Plaintiff,)

v.)

Case No.: 1:18-cv-00211

NOUF BINT NAYEF ABUL-AZIZ AL SAUD and)
MOHAMMAD BIN ABDULLAH AL SAUD)

Defendants.)
_____)

DEFENDANTS' MOTION TO STRIKE

Defendants Nouf bint Nayef Abul-Aziz al Saud and Mohammad bin Abdullah al Saud, by and through undersigned counsel, move, pursuant to Federal Rule of Civil Procedure 12(f), to strike paragraphs 14, 15, 16, and 17 of Plaintiff's First Amended Complaint because they are immaterial, and highly prejudicial to Defendants. The grounds supporting Defendant's Motion to Strike are set forth in the accompanying Memorandum.

Dated: July 6, 2018

Respectfully submitted,

/s/ John L. Brownlee

John L. Brownlee (VSB# 37358)

Stuart G. Nash (*pro hac vice*)

David L. Haller (*pro hac vice*)

HOLLAND & KNIGHT LLP

1650 Tysons Boulevard, Suite 1700

Tysons, VA 22102

Telephone: 703.720.8600

Facsimile: 703.720.8610

Email: John.Brownlee@hklaw.com

Email: Stuart.Nash@hklaw.com

Email: David.Haller@hklaw.com

*Counsel for Defendants Nouf bint Nayef
Abul-Aziz al Saud and Mohammad bin
Abdullah al Saud*

CERTIFICATE OF SERVICE

I certify that on this 6th day of July, 2018, a true copy of the foregoing was served via courier to:

Nicholas Cooper Marritz
Legal Aid Justice Center
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
nicholas@justice4all.org

Jonathan A. Langlinais
Jenner & Block LLP
1099 New York Avenue NW, Suite 900
Washington, DC 20001
jalanglinais@jenner.com

Le'ake Fesseha
Le'ake Fesseha Law Office
901 S. Highland Street, Suite 312
Arlington, VA 22204
leakef@hotmail.com

Sarah Linnell Bessell
The Human Trafficking Legal Center
1030 15th Street NW, Suite 1048
Washington, DC 20005
sbessell@htlegalcenter.org

Counsel for Plaintiff Simret Semere Tekle

Richard F. Levy
Jenner & Block LLP
1099 New York Avenue NW, Suite 900
Washington, DC 20001
rlevy@jenner.com

Agnieszka M. Fryszman
Cohen Milstein Sellers & Toll PLLC
1100 New York Avenue NW, Fifth Floor
Washington, DC 20005
afryszman@cohenmilstein.com

Martina Elizabeth Vandenberg
The Human Trafficking Legal Center
1030 15th Street NW, Suite 1048
Washington, DC 20005
mvandenberg@htlegalcenter.org

/s/ John L. Brownlee
John L. Brownlee